# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

MASTERFILE CORPORATION,  Plaintiff	<i>\$</i>	
VS.	3 %	C.A. NO. 4:15-cv-1186
ECLIPSE ROOFING, LLC Defendant	3 60 60 60 60 60 60	DEMAND FOR JURY TRIAL

### COMPLAINT

PLAINTIFF, MASTERFILE CORPORATION, through its attorneys, brings this complaint for copyright infringement and alleges as follows:

### **PARTIES**

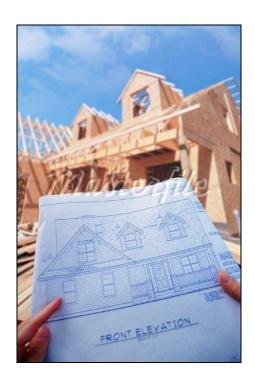
- 1. PLAINTIFF, MASTERFILE CORPORATION ("Masterfile"), is a Canadian corporation with its principal place of business 3 Concorde Gate, Fourth Floor, Toronto, Ontario, Canada M3C 3N7. Masterfile is a stock image licensing agency in the business of licensing reproduction and display rights in images to users for a fee.
- 2. On information and belief, DEFENDANT ECLIPSE ROOFING, LLC ("Eclipse") is a limited liability company registered with the Texas Secretary of State, Texas File Number 0801288127, with a registered address of 17301 Aldenwilds Lane, Richmond, TX 77407-2637. Eclipse may be served through its registered agent and member, Ashley Choate, at 1020 Brand Lane, Apt. 913, Stafford, TX 77477.

### **JURISDICTION AND VENUE**

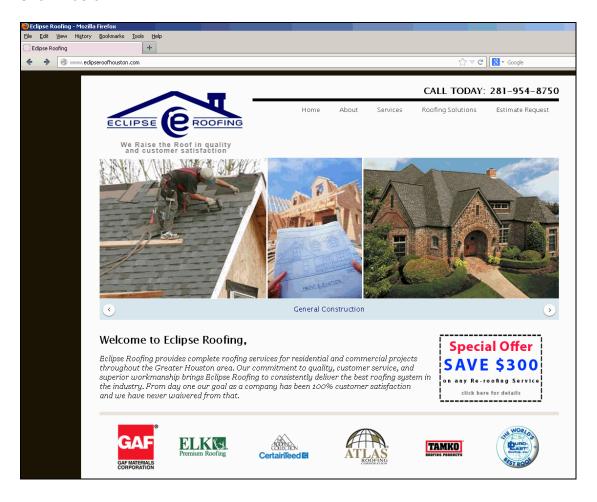
- 3. This action arises under the Federal Copyright Act of 1976, as amended, 17 U.S.C. §§ 101, et seq. Jurisdiction is founded on 28 U.S.C. §§ 1331 and 1338(a).
- 4. This Court has personal jurisdiction over Defendant by virtue of its presence in this District, as well as its transacting, doing, and soliciting business in this District.
- 5. Venue is proper under 28 U.S.C. §§ 1391(b)(1) and (2) and 1400(a).

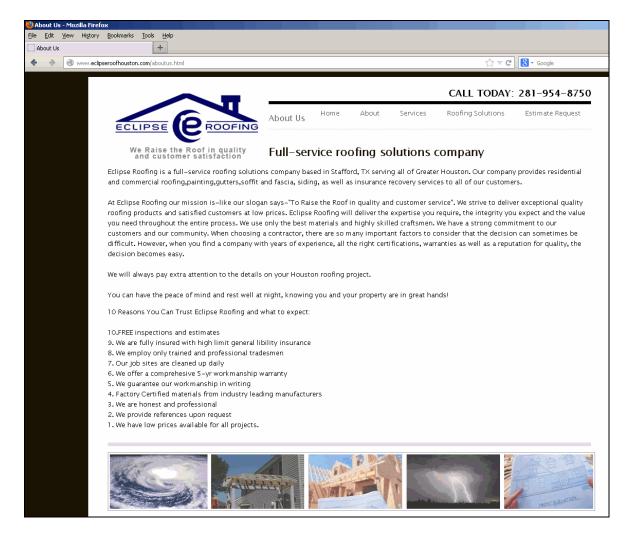
### **FACTS COMMON TO ALL CAUSES OF ACTION**

6. In 2002, Masterfile obtained the exclusive assignment of the copyright in one (1) image identified by Masterfile as Image No. 700-00089568 (the "Image"), as shown below:



- 7. Masterfile has complied in all respects with the Copyright Act of 1976, 17 U.S.C. § 101, et seq., as amended, and all other laws and regulations governing copyrights and has secured the exclusive rights and privileges in and to the copyright for the Image. The Register of Copyrights for the U.S. Copyright Office issued Masterfile a Certificate of Registration for the copyright to the Image, number VA 1-166-519, effective September 20, 2002, attached as Exhibit A.
- 8. In or about February 2013, Masterfile became aware that Defendant was reproducing and displaying the Image, once in its entirety and once as a cropped version, at the websites located at www.eclipseroofhouston.com and at http://www.eclipseroofhouston.com/aboutus.html (collectively, the "Website"), as shown below:





- 9. Upon information and belief, the Defendant controls, owns, and operates the Website, through which it advertises its services and solicit customers.
- 10. On or about February 21, 2013, Masterfile provided notice via a letter sent by FedEx to Defendant that the Image appeared on the Website without authorization of Masterfile or the law.
- 11. Defendant refused to pay retroactive license fees to Masterfile for the unauthorized use of the Image on the Website.

- 12. On March 11, 2013, Masterfile received a letter from an attorney, Oscar Michelen ("Michelen"), stating that he represented Eclipse in this matter.
- 13. On April 30, 2014, Masterfile retained an attorney who, between April 30, 2014, and the filing of this complaint, contacted Michelen more than twenty times by email correspondence in an attempt to resolve Masterfile's claims against Eclipse, but Michelen never responded.
- 14. Defendant has never been licensed or authorized to reproduce or display the Image on the Website.
- 15. The Image is an original work of authorship fixed in a tangible medium of expression from which it can be perceived, reproduced, or otherwise communicated, either directly or with the aid of a machine or device, and as such is protected by copyright.
- 16. At all times relevant to this action, Masterfile was the sole and exclusive owner of all right, title, and interest in and to the copyright in the Image.

### FIRST CLAIM FOR RELIEF COPYRIGHT INFRINGEMENT

- 17. Masterfile re-alleges and incorporates by reference paragraphs 1 through 16 above.
- 18. On information and belief, Defendant had access to the Image through the Internet.
- 19. Without Masterfile's authorization, Defendant reproduced and publicly displayed Masterfile's copyrightable work in violation of 17 U.S.C. § 501.
- 20. Defendant's reproduction and display of the Image are substantially similar to the Image.

- 21. Defendant has not compensated Masterfile for its reproduction or display of the Image.
- 22. Defendant's conduct violates the exclusive rights belonging to Masterfile as owner of the copyright for the Image, including without limitation, Masterfile's exclusive rights under 17 U.S.C. § 106.
- 23. Defendant's conduct violates the exclusive rights belonging to Masterfile as owner of the copyright for the Image, including without limitation, Masterfile's exclusive rights under 17 U.S.C. § 106.
- 24. As Masterfile first discovered Defendant's reproduction and display of the Image in or around February 2013, Masterfile's claims are within the three-year statute of limitations period pursuant to 17 U.S.C. § 507(b).
- 25. As a direct and proximate result of its wrongful conduct, Defendant has realized and continues to realize profits and other benefits rightfully belonging to Masterfile for the Image. Accordingly, Masterfile seeks an award of actual damages and profits against Defendant plus attorneys' fees and costs pursuant to 17 U.S.C. §§ 504(b) and 505.
- 26. In the alternative, Masterfile is entitled to and seeks statutory damages against Defendant for its wrongful conduct, including attorneys' fees and costs pursuant to 17 U.S.C. §§ 504(c)(1) and 505.
- 27. Defendant's infringement of the Image was willful and performed with knowledge that the reproduction and display of the Image were unauthorized; Masterfile is therefore entitled to the recovery of enhanced statutory damages pursuant to U.S.C. § 504(c)(2).

### SECOND CLAIM FOR RELIEF DECLARATORY JUDGMENT

- 28. Masterfile adopts and incorporates paragraphs 1 through 27 above.
- 29. An actual controversy has arisen between Masterfile and Defendant. Masterfile desires a judicial determination that: (1) Masterfile owns all rights, title and interest in the Image; (2) that Defendant had no license or permission to reproduce or display; (3) that Defendant infringed Masterfile's copyright when Defendant reproduced and displayed the Image on the Website; (4) and that Defendant has no present or future rights to reproduce, display, distribute, or create a derivative work of the Image.

## THIRD CLAIM FOR RELIEF ATTORNEYS' FEES AND COSTS

- 30. Plaintiff adopts and incorporates paragraphs 1 through 29 above.
- 31. Due to the unlawful actions by Defendant, it has become necessary for Masterfile to retain the services of the undersigned Texas attorney to prosecute its claims. Masterfile is entitled to payment of its reasonable and necessary attorney's fees and costs from Defendant.

#### **PRAYER**

For the reasons stated herein, Plaintiff respectfully requests that this Honorable Court:

- 32. Order that Defendant's unauthorized conduct violates Masterfile's rights under the Federal Copyright Act at 17 U.S.C. §101, et seq.;
- 33. Order Defendant to account to Masterfile for all gains, profits, and advantages derived by Defendant from the unauthorized uses of the Image;

- 34. Award Masterfile all profits and damages against Defendant in such amount as may be found pursuant to 17 U.S.C. § 504(b) (with interest thereon at the highest legal rate) for the Defendant's unauthorized reproduction and display, distribution of Masterfile's copyright in the Image; alternatively, maximum statutory damages against Defendant in the amount of \$30,000 for the infringement pursuant to 17 U.S.C. § 504(c)(1); or such other amount as may be proper pursuant to 17 U.S.C. § 504;
- 35. Alternatively, award Masterfile maximum statutory damages against Defendant in the amount of \$150,000 for each unauthorized violation of 17 U.S.C. § 106 pursuant to 17 U.S.C. § 504(c)(2); or such other amount as may be proper pursuant to 17 U.S.C. § 504;
- 36. Award Masterfile its costs of litigation, reasonable attorneys' fees, and disbursements in this action against Defendant pursuant to 17 U.S.C. § 505;
- 37. Enter preliminary and permanent injunctions providing that Defendant shall deliver to Masterfile all copies of the infringing work, and the derivative work, and all other materials containing such infringing copies in the Defendant's possession, custody, or control, for destruction;
- 38. Enter preliminary and permanent injunctions providing that Defendant shall deliver to Masterfile accountings identifying each recipient of any infringing works;
- 39. Enter preliminary and permanent injunctions enjoining Defendant from engaging in any further acts of copyright infringement of Masterfile's Image; and
- 40. Grant Plaintiff all other and further relief, in law or in equity, to which

plaintiff shows itself to be justly entitled.

Masterfile further prays that, on final trial, the Court award to Masterfile all elements of damage set forth herein against Defendant for Plaintiff's damages, attorneys' fees and costs, interest, court costs, and to enjoin Defendant from further use of Masterfile's Image, that this matter go hence without delay, and for such other and further relief, both special and general, at law and in equity, to which the Plaintiff may show to be justly entitled.

#### **JURY DEMAND**

Masterfile respectfully requests that when this case proceeds to trial, it be placed on the Court's jury trial docket.

Respectfully submitted,

The Pam Rea Law Firm, PLLC

<u>/s/ Pam Rea\_</u>

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Attorney in Charge

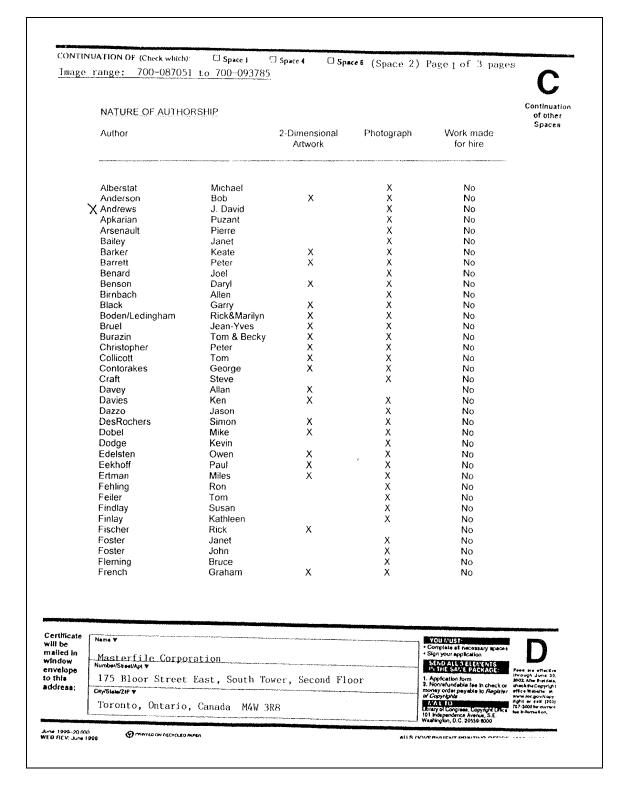
Attorney in Charge for Masterfile Corporation

### **EXHIBIT A**

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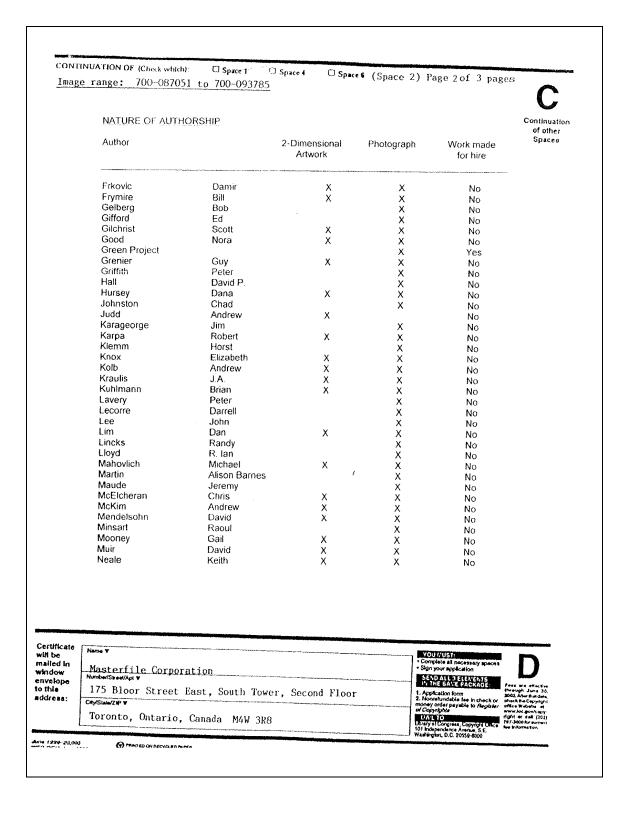
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